

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ROBERT G. WINGO,

Plaintiff,

vs.

THYSSENKRUPP MATERIALS NA, INC.,  
d/b/a COPPER and BRASS SALES, INC.

Defendant.

Case No. 1:08:CV-00368

Honorable Samuel Der-Yeghiayan  
Magistrate Judge Schenkier

**DECLARATION OF PETE LAROCCO**

STATE OF ILLINOIS

COUNTY OF COOK

I, Pete LaRocco, state, based on my personal knowledge, that I am competent to testify as follows:

1. Since 1978, I have been employed at ThyssenKrupp Materials NA, Inc., d/b/a Copper and Brass Sales, Inc.'s ("Copper and Brass" or "the Company") warehouse facility located in Schaumburg, Illinois, and I am currently a lead machine operator.

2. My responsibilities also include serving as the union steward for the Company's hourly warehouse employees pursuant to a collective bargaining agreement between Copper and Brass and Teamsters Local 714 ("the Collective Bargaining Agreement").

3. Plaintiff Robert Wingo ("Plaintiff") was employed as a warehouse clerk at Schaumburg from 1984 until his termination on December 3, 2007.

4. An employee who makes a verbal complaint about an incident at the Company is not the same thing as filing a formal, written grievance under the Collective Bargaining Agreement.

5. Plaintiff never filed a formal, written grievance under the Collective Bargaining Agreement in connection with his August 30, 2007 allegations.

6. During Plaintiff's employment, I never told him that he is "a dead man."

I declare under penalty of perjury that the foregoing is true and correct. Further Declarant sayeth not.



Pete LaRocco

Dated: August 8, 2008

DETROIT 32598181